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March 8, 2022

BY ECF

Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Sean Vaughn,
13 Cr. 867 (WHP)**

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: March 10, 2022

Dear Judge Gardephe:

I write to respectfully request that Mr. Sean Vaughn's conditions of supervised release be modified to remove the condition of home detention. The U.S. Probation Office consents to this request, and the Government takes no position.

On July 21, 2020, Judge Pauley granted Mr. Vaughn's application for compassionate release subject to the following conditions, *inter alia*: the defendant shall be subject to home incarceration enforced by location monitoring until November 8, 2022; and the defendant shall be confined to the residence approved by the Probation Office 24-hours per day except for emergency medical visits. On January 7, 2021, Judge Pauley granted Mr. Vaughn's request to modify his supervised release conditions from home incarceration to home detention.

Since his release over nineteen months ago, Mr. Vaughn has taken advantage of every opportunity to better himself. Mr. Vaughn's U.S. Probation Officer, Larren Riley, informs defense counsel that Mr. Vaughn has maintained full compliance with both his general conditions and his location monitoring condition. Officer Riley also notes that Mr. Vaughn has independently sought and secured gainful employment as a delivery driver for FreshDirect, and he has become a very involved co-parent for his son, who resides with Mr. Vaughn on a regular basis. All of these facts underline Mr. Vaughn's positive adjustment to Court-ordered supervision, as well as his own motivation to be a productive member of the community.

For the foregoing reasons, we respectfully request that the Court modify Mr. Vaughn's conditions of supervised release by removing the condition of home detention. If the Court grants this request, Mr. Vaughn will continue to report as directed to his U.S. Probation Officer. The U.S. Probation Office consents to this request, and the Government takes no position.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Mark B. Gombiner

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